

March 17, 2020

Via ECF

Honorable Sarah Netburn
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, New York 10007

Re : Purnell v. NYC HRA P.O. Natasha Blount, et al.
Docket No.: 1:18-cv-11758-ALC-SN
LJAA File No.: 0322.1042.0000

Dear Magistrate Netburn:

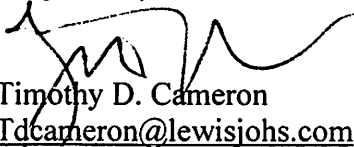
This office represents defendants, FJC Security Services, Inc., Dominic Graham and Juan Helly i/s/h/a Juan Holly (FJC defendants) in the above matter. The deposition of Mr. Purnell is scheduled to take place on March 20, 2020 at 10 a.m.

The Court deadline for discovery to be complete is presently set for April 17, 2020. Given the current concerns pertaining to the coronavirus pandemic and the need for social distancing, we do not believe the deposition should go forward at this time. Mr. Purnell is an at-risk citizen with a history of COPD, among other maladies. In addition, his attorney, Mr. Levine is also an at-risk citizen as he is 80 years old.

As such, all parties join in requesting an extension for discovery to be completed in this matter by at least 120 days. We also ask, that we be given the ability to further extend the discovery completion date should the social climate dictate it.

We appreciate You Honor's time and attention to this matter.

Respectfully submitted,


Timothy D. Cameron
Tdcameron@lewisjohs.com
Islandia Office
TDC: edef

cc: All Counsel of Record (via ECF)